

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

FREE SPEECH SYSTEMS, LLC,

DEBTOR.

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Case No. 22--60043

**(Subchapter V Debtor)
Chapter 11**

**WITNESS AND EXHIBIT LIST
FOR HEARING ON DEBTOR'S EMERGENCY MOTION TO AMEND INTERIM
ORDER AUTHORIZING THE USE OF CASH COLLATERAL
[ECF. NO. 51]**

Judge:	Hon. Christopher M. Lopez
Hearing Date:	Friday, August 12, 2022
Hearing Time:	1:00 p.m. (CT)
Party's Name:	Free Speech Systems, LLC
Attorney's Name:	Raymond W. Battaglia, Kyung S. Lee
Attorney's Phone:	(210) 601-9405; (713) 301-4751
Nature of Proceeding:	Hearing on: <ul style="list-style-type: none"> Emergency Motion to Amend Interim Order Authorizing the Use of Cash Collateral [Docket No. 51]

The Law Offices of Raymond W. Battaglia (the “**Battaglia Firm**”), general bankruptcy counsel for Free Speech Systems, LLC (the “**Debtor**”) and Shannon & Lee LLP (“**S&L**”) proposed co-counsel to the Debtor, in the above-captioned chapter 11 case (the “**Chapter 11 Case**”), hereby submit this witness and exhibit list in connection with the hearing to be held on Friday, August 11, 2022 at 1:00 P.M.(Central Time) (the “**Hearing**”) on the pleading listed below.

- Emergency Motion to Amend Interim Order Authorizing the Use of Cash Collateral [Docket No. 51].

WITNESSES

The Debtor may call any of the following witnesses at the Hearing, whether in person or by proffer:

1. W. Marc Schwartz, Chief Restructuring Officer of Free Speech Systems, LLC;
2. Patrick Reiley, Member, Blue Asension Logistics LLC;
3. Any witnesses necessary to establish notice of the Hearing has been provided; and
4. Any witnesses necessary to rebut the testimony of any witnesses called or designated by any other parties.

EXHIBITS

The Debtor may offer for admission into evidence any of the following exhibits at the hearing:

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
1	Emergency Motion to Amend Interim Order Authorizing the Use of Cash Collateral [Docket No. 51].				
2	13-Week Cash Collateral Budget				
3	Blue Asension Logistics Price List				

The Debtor reserves the right to supplement, amend or delete any witness and exhibits prior to the Hearing. The Debtor also reserves the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Debtor finally reserves the right to introduce exhibits previously admitted.

Respectfully submitted the 12th day of August, 2022.

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Proposed Counsel to the Debtor and Debtor-In-Possession

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*Proposed Co-Counsel to the Debtor
and Debtor in Possession*

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was filed with the Court and served electronically upon those parties registered to receive electronic notice via the Court's CM/ECF system, as set forth below. I further certify that it has been transmitted by first class mail to the parties on the attached service list.

/s/ Raymond W. Battaglia

Raymond W. Battaglia